

# CALL CENTER QUESTIONS & ANSWERS

## RCRA

### 1. Identifying Generator Units on a Part A Permit Application

*An owner of a facility is preparing a RCRA permit application to thermally treat hazardous waste generated on site. Before treating this waste, the facility accumulates the hazardous waste on site for less than 90 days in containers and tanks in compliance with 40 CFR §262.34. Must the 90-day container and tank accumulation units be included in Part A of the permit application (EPA Form 8700-23)?*

Owners and operators seeking a RCRA permit are not specifically required to identify permit-exempt generator accumulation units in Part A of the permit application. However, an owner or operator of a facility may be required to identify the area as a solid waste management unit (SWMU) under the requirements of §270.14(d) in Part B of the permit application. EPA considers a SWMU to be “any discernible unit at which wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid and hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released” (61 FR 19432, 19442; May 1, 1996). If a generator accumulation unit meets the definition of a SWMU, the owner or operator is required to identify the unit in Part B of the permit application.